

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHELLE MARSKI,

Plaintiff,

V.

Case No. 19-cv-04132

**COURIER EXPRESS ONE, INC.,
PRECC, INC., PREMIER CC LLC, A
QUALTEK COMPANY, VERTEK, LLC,
DISPATCH EXPRESS INC. and ANTHONY
URSO.**

Hon. Judge John Robert Blakey

Defendants.

**PLAINTIFF’S MOTION FOR LEAVE TO FILE EXHIBITS
8(a), 26 AND 27 TO PLAINTIFF’S MEMORANDUM IN
SUPPORT OF HER MOTION TO COMPEL UNDER SEAL**

Plaintiff Michelle Marski, pursuant to Local Rule 26.2, respectfully requests leave from the Court to file Exhibits 8(a), 26 and 27 to Plaintiff's Memorandum in Support of her Motion to Compel Defendants to Produce ESI in Plaintiff's Former Premier CC, Inc. Email Account electronically under seal for the following reasons:

1. In support of her Memorandum in Support of her Motion to Compel Defendants’ Production of ESI from Plaintiff’s “premierccdirect” email account, and with regard to her argument that Defendants have access to the emails in Premier CC, Inc.’s email account., Ms. Marski cited and referred to the following exhibits in her Memorandum:

- a. Exhibit 8(a): A copy of the Asset Purchase Agreement and Disclosure Schedule produced by Defendant Premier CC, LLC bearing the designation “Confidential – Subject to Protective Order”; and
 - b. Exhibits 26 and 27: Emails between Plaintiff and various employees of Defendants containing personnel information of other past or current employees of one or more Defendants.
2. Unredacted copies of the exhibits listed above will be provisionally filed under seal with the Court on March 3, 2020 as exhibits to Plaintiff’s Memorandum pursuant to Local Rule 26.2 and will be submitted to the Court with the courtesy copy of Plaintiff’s Memorandum in Support of her Motion to Compel.
3. Because Premier CC LLC has designated the document in Exhibit 8(a) as Confidential under the Parties’ September 13, 2019 Confidentiality Order (Docket No. 39 and because Exhibits 26 and 27 contain information that could fall within subsection (g) to Section 2 of the Confidentiality Order (regarding personnel or employment records of a person who is not a party to this case), Plaintiff seeks leave from the Court to file these exhibits under seal.

WHEREFORE, Plaintiff respectfully requests leave from the Court pursuant to Local Rule 26.2 to file Exhibits 8(a), 26 and 27 to Plaintiff’s Motion to Compel Defendants’ Production of ESI in Plaintiff’s Former Premier CC, Inc. email account electronically under seal.

Dated: March 3, 2020

Respectfully Submitted,

By: Stacey B. Vucko
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